

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

TIMOTHY JONES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.:
	)	
MIRAMED REVENUE GROUP, LLC,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

To: Judges of the United States District Court for the Eastern District of Michigan

Defendant, MIRAMED REVENUE GROUP, LLC ("Miramed" or "Defendant"), by and through its attorneys, Hinshaw & Culbertson LLP, and for its Notice of Removal pursuant to 28 U.S.C. §1441(a) and 1446, and in support thereof, state as follows:

1. On or about April 26, 2018, Plaintiff Timothy Jones, filed a complaint against Miramed in the Small Claims Court of the State of Michigan 12th Judicial District. A copy of the complaint is attached hereto and incorporated herein by reference as Exhibit A.

2. Defendant has been served with the summons and complaint.

3. Copies of the above mentioned summons and complaint constitute true and correct copies of all process, pleadings and orders.

4. The complaint asserts a federal cause of action against Miramed for purported violations of the Fair Debt Collection Practices Act.

5. This Notice was filed with the Clerk of the United States District Court within thirty (30) days after service of the complaint upon the Defendant. 28 U.S.C. §1446(b).

6. 28 U.S.C. §1441(b) provides as follows:

(b) Any civil action of which the district courts have original jurisdiction founded on a claim or right arising under the Constitution, treaties or laws of the United States shall be removable

without regard to the citizenship or residence of the parties. Any other such action shall be removable only if none of the parties in interest properly joined and served as defendants is a citizen of the state in which such action is brought.

7. The United States District Court for the Eastern District of Michigan has jurisdiction over the plaintiff's claim due to the fact that the allegations against Miramed contained in his complaint arise under the Constitution, laws or treaties of the United States. 28 U.S.C. §1331.

8. In the complaint, Plaintiff alleges that Miramed continued to place phone calls to him after he requested calls to cease.

9. Plaintiff claims Miramed violated the FDCPA and seeks recovery of statutory damages under the FDCPA.

10. Plaintiff's complaint invokes federal question jurisdiction because the allegations involve claims under the FDCPA, 15 U.S.C. §1692 *et. seq.*

WHEREFORE, the Defendant, MIRAMED REVENUE GROUP, LLC, respectfully requests that this case proceed in this court as an action properly removed to it.

Respectfully submitted,

MIRAMED REVENUE GROUP, LLC,  
Defendant

/s/ Nabil G. Foster

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